

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:24-cv-00724-M**

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF  
ELECTIONS,

Defendant.

**NOTICE OF RELATED CASE**

The North Carolina State Board of Elections, pursuant to Local Rule 40.3(b), hereby notifies the Court that the following cases are related to this one:

1. *United Sovereign Americans, Inc., et al. v. North Carolina State Board of Elections, et al.*, No. 5:24-cv-00500 (filed August 24, 2024).
2. *Republican National Committee, et al. v. North Carolina State Board of Elections, et al.*, No. 5:24-cv-00547 (filed September 23, 2024).
3. *North Carolina Democratic Party v. North Carolina State Board of Elections, et al.*, No. 5:24-cv-00699 (filed December 6, 2024).

The North Carolina State Board of Elections is a party in each of the four cases, each case involves substantially the same factual background, and each case will require the Court to interpret the voter-registration and list-maintenance processes set forth in the Help America Vote Act (HAVA), 52 U.S.C. §§ 20901-21145, the Voting Rights Act, 52 U.S.C. § 10307, the Civil Rights Act, 52 U.S.C. § 10101, and the National Voter Registration Act, 52 U.S.C. §§ 20501-20511, respectively. Thus, the cases concern substantially the same parties, transactions, or events and call for a determination of the same or substantially related or similar questions of law and fact. *See* Local Rule

40.3(a)(1)-(2). Additionally, litigating the four cases before different judges would likely be unduly burdensome and duplicative and risk conflicting results. *See id.* 40.3(3).

Respectfully submitted, this 19th day of December 2024.

/s/ Mary Carla Babb  
Mary Carla Babb  
Special Deputy Attorney General  
N.C. State Bar No. 25731  
[MCBabb@ncdoj.gov](mailto:MCBabb@ncdoj.gov)

/s/ Terence Steed  
Terence Steed  
Special Deputy Attorney General  
N.C. State Bar No. 52809  
[TSteed@ncdoj.gov](mailto:TSteed@ncdoj.gov)

North Carolina Department of Justice  
P.O. Box 629  
Raleigh, NC 27602  
Phone: 919-716-6900  
Fax: 919-716-6758

*Counsel for Defendant*

## **CERTIFICATE OF SERVICE**

I certify that the foregoing Notice of Related Case was filed electronically with the Clerk of Court using the CM/ECF system, and also served by email and US Mail to the below listed attorneys for Plaintiff:

Craig D. Schauer  
Troy D. Shelton  
Dowling PLLC  
3801 Lake Boone Trail  
Suite 2600  
Raleigh, NC 27607  
(919) 529-3351  
[cschauer@dowlingfirm.com](mailto:cschauer@dowlingfirm.com)  
[tshelton@dowlingfirm.com](mailto:tshelton@dowlingfirm.com)

Philip R. Thomas  
N.C. State Bar No. 53751  
[pthomas@chalmersadams.com](mailto:pthomas@chalmersadams.com)  
Chalmers, Adams, Backer & Kaufman, PLLC  
204 N Person Street  
Raleigh, NC 27601

*Counsel for Petitioner*

Jefferson Griffin  
Dowling PLLC  
3801 Lake Boone Trail, Suite 2600  
Raleigh, NC 27607

*Petitioner*

This the 19th day of December, 2024.

/s/ Mary Carla Babb  
Mary Carla Babb  
Special Deputy Attorney General